

District Judge Barbara J. Rothstein

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RAMIN FARAJI, *et al.*,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, *et al.*,

Defendants.

Case No. 2:23-cv-01811-BJR

STIPULATED MOTION TO HOLD
CASE IN ABEYANCE AND ORDER

Plaintiffs and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings through April 22, 2024. Plaintiffs bring this litigation pursuant to the Administrative Procedure Act and the Mandamus Act seeking, *inter alia*, to compel the U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate Plaintiff Miyake-Faraji’s Form I-130, Petition for Alien Relative, and Form I-485, Application to Register Permanent Residence or Adjust Status. Defendants’ response to the Complaint is currently due on March 22, 2024. For good cause, the parties request that the Court hold this case in abeyance through April 22, 2024.

Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to

control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ. P. 1.

With additional time, this case may be resolved without the need of further judicial intervention. USCIS has scheduled Plaintiff’s Form I-130 interview on March 20, 2024. After the interview, USCIS needs additional time to act on her Form I-130. Additionally, depending on whether her Form I-130 is approved or denied, USCIS will be able to determine next steps for her husband’s Form I-485.

Accordingly, the parties respectfully request that the instant action be stayed until April 22, 2024. The parties will submit a joint status report on or before April 22, 2024. The parties further request that the Court’s Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement be stricken. Dkt. No. 8.

DATED this 19th day of March, 2024.

Respectfully submitted,

TESSA M. GORMAN
United States Attorney

DGO LEGAL

s/ Michelle R. Lambert

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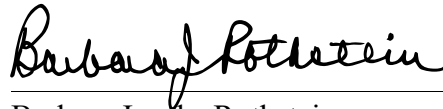
Attorneys for Defendants

I certify that this memorandum contains 321 words, in compliance with the Local Civil Rules.

ORDER

The case is held in abeyance until April 22, 2024. The parties shall submit a joint status report on or before April 22, 2024, which among other things, will include jointly proposed dates by which the parties will comply with the deadlines set forth in the Order Regarding Initial Disclosures and Joint Status Report FRCP 26(f) [Dkt. No. 8]. It is so **ORDERED**.

DATED this 20th day of March, 2024.



Barbara Jacobs Rothstein
U.S. District Court Judge